Kevan Abrahams
Theodore Roosevelt Executive and Legislative Building
1550 Franklin Avenue
Mineola, NY 11501

June 21, 2012

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: FCC-2012-0164

Dear Chairman Genachowski:

As an elected official representing a district with a sizeable minority population, I am writing to express opposition to the proposed regulations involving wireline third-party billing Notice of Proposed Rulemaking. Having spoken to business owners, as well as my constituents, I know that third-party billing is a valued service that helps businesses cut down on costs and allows consumers to consolidate bills. Small businesses use third-party billing to cut down on administrative costs, making them better able to compete with larger companies. Ending legitimate third-party billing would take its toll on these businesses, many of which are minority-owned and strike an unnecessary blow to our fragile economy.

As you consider the proposed rule, I strongly urge you to consider the current economic climate. Small businesses, which are responsible for the creation of more than 60 percent of all jobs in the United States, are struggling to stay afloat. With economic indicators continuing to lag and national unemployment hovering near 8 percent, the FCC should not advance policies that can needlessly hinder businesses' ability to grow and create jobs.

Unfortunately, proposals to limit third-party billing, or ban it outright, would do just that. Third-party billing for wireline telecommunications services allows businesses to consolidate multiple services onto a single bill, thereby eliminating overhead and administrative costs, as well as the need to use high-interest credit cards to pay for services. Reduced operating costs keep prices low for consumers. Without third-party billing, businesses will lose a valuable, cost-effective way to stay competitive and expand their business.

In addition, the proposed ban on wireline third-party billing would have a disproportionately negative impact on the black American community, in particular. Black-owned businesses grew by 60 percent between 2002 and 2007. This is more than three times the national growth rate. With the overwhelming majority of these 1.9 million businesses having less than 20 employees, many rely on third-party billing to streamline bookkeeping and save costs.

A rule prohibiting or limiting third-party billing will adversely impact black consumers as well, as more than one million calls were made last year between the U.S. and countries throughout Africa and the Caribbean by billing the call on the local telephone bill.

While I applaud your efforts to protect consumers from cramming, our country cannot afford growth restricting regulatory policies that would hurt small businesses and their ability to create jobs. Most notably, a May 10, 2012 Executive Order “Identifying and Reducing Regulatory Burdens specifically stated that unjustified regulatory burdens and costs should be carefully examined, considering the current economic climate. I ask that the Commission consider rules that preserve the benefits of wireline third-party billing while adequately weighing the interests of the black-owned business and consumer communities.

Sincerely,

Kevan Abrahams

Nassau County Minority Caucus Leader, Legislative District One